COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN II) Northern and Central California, Nevada, and Utah Contract Number N62474-94-D-7609 Contract Task Order No. 0088

Prepared For

DEPARTMENT OF THE NAVY
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FINDING OF SUITABILITY TO LEASE FOR
PARCELS T077, T078, T079, AND T080
INCLUDING BUILDINGS 570, 572, 670, AND 671
TO SUPPORT THE LEASE OF THE BRIG AT
NAVAL STATION TREASURE ISLAND, CALIFORNIA

FINAL

July 15, 1996

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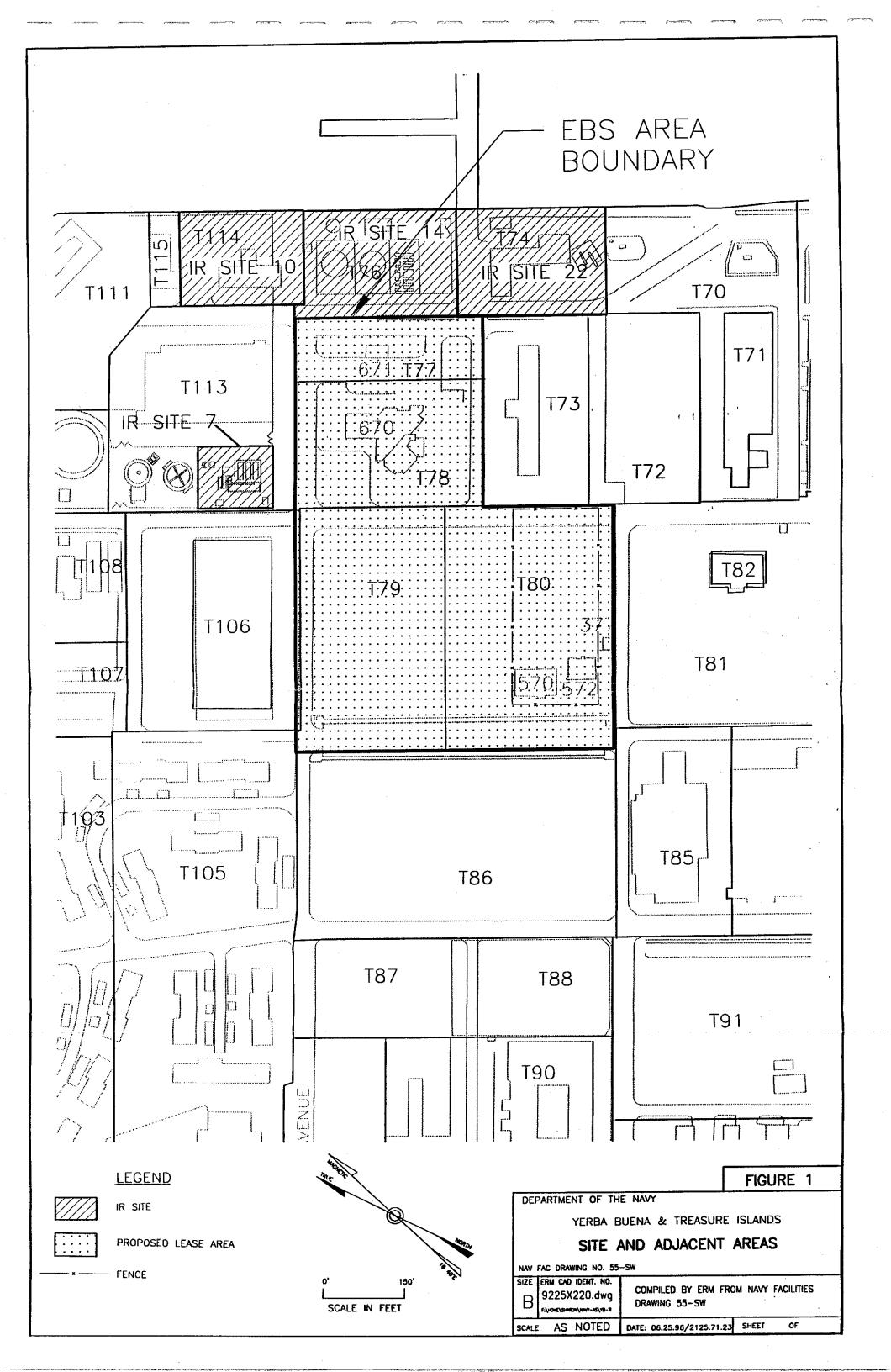
FINDING OF SUITABILITY TO LEASE FOR NAVY BRIG SITE AT NAVAL STATION TREASURE ISLAND

1.0 PURPOSE

- a. The purpose of this Finding of Suitability to Lease (FOSL) is to document environmentally related findings regarding the proposed lease of the Navy Brig (the site) at Naval Station Treasure Island (NSTI) in San Francisco County, California. The subject property is described in Section 2.0 below and is shown in Figure 1. The subject property will be leased to the City of San Francisco for continued use of the existing Navy Brig. The Navy owns the land and buildings at the subject property.
- b. This FOSL is a result of a thorough analysis of the information contained in the following documents:
 - o Final Limited Environmental Baseline Survey/Community Environmental Response Facilitation Act Report for Naval Station Treasure Island, ERM-West, Inc., December 1, 1994 (EBS CERFA Report)
 - o Final Basewide Environmental Baseline Survey Report for Naval Station Treasure Island, ERM-West, Inc., May 19, 1995 (basewide EBS)
 - o Site-Specific Environmental Baseline Survey, Navy Brig Site at Naval Station Treasure Island, PRC and GAIA Consulting, Inc. (PRC), July 1, 1996 (SSEBS)
 - o Draft (Revision 1) Environmental Baseline Survey Sampling Workplan for Naval Station Treasure Island, ERM-West, December 18, 1995
 - o Remedial Investigation Phase IIB Preliminary Data, PRC Environmental Management, Inc. (PRC), 1996

2.0 PROPERTY DESCRIPTION

The site is about 9 acres in size, and encompasses portions of Parcels T077, T078, T079, and T080. The subject property, located in the northeast portion of NSTI, is currently used as the Navy Brig and associated workshop, and as a training facility. The site also encompasses open space. The site and the adjacent areas are shown in Figure 1. The most recent site reconnaissance for this area was conducted on April 10, 1996. The current and former buildings at the site have been used as an exchange annex, and for administration, imprisonment (brig), barracks, operational training, and related support activities.



Currently, five buildings (Building 671 on Parcel T077, Building 670 on Parcel T078, and Buildings 377, 570, and 572 on Parcel T080) cover about 5 percent of the site. Building 671 is currently used as a shop for the brig; the brig is located in Building 670. Buildings 570 and 572 are used for administration and ship load-balancing training (supply transfer at sea). Building 377 is Sewage Lift Station #17. Building 377 is not part of the lease area.

The remaining 95 percent of the parcel is open space, including parking areas, undeveloped areas, the inmate exercise yard, an outdoor training area, and storage in several conex boxes and cabinets, which are located mainly at the Brig and the training facility. The training yard at Parcel T080 contains several stationary, large pieces of crane-like loading equipment used to train sailors on ship-loading procedures. Unpaved open areas are limited to a large, unmanicured grassy area on Parcel T079, and landscaped, grassy areas on Parcels T077 and T078. Two unpaved, grassy strips are also present inside the fenced training area on Parcel T080, but were not well-maintained. The inmate exercise yard is fenced and paved, as is the training facility. Inmates do not have access to unpaved areas of the site. Parking areas, streets, and walkways are also paved. Several pad and pole-mounted transformers are present on the open areas of the site.

The Navy Brig and related workshop were built between 1987 and 1992. Buildings 570 and 572 were constructed in 1988, and Building 377 is believed to have been constructed in the 1940s. Six buildings formerly located at the site have been demolished. Buildings 207, 208, 209, and 210 are believed to have been formerly used as barracks. These buildings were present on Parcels T079 and T080 from 1947 to the 1970s. Building 218 was used as an exchange annex and storehouse, and for bag (luggage) storage and administration. Building 218 covered about 98,000 square feet, and was located on Parcels T077 and T078. Building 218 was demolished prior to 1977. Building 580 was constructed in 1988, and removed in 1996. Building 580 was used as an elevator repair and operations training facility, and was associated with several small storage sheds. All of the associated sheds have also been removed.

An aboveground storage tank (AST) is located on the northeast side of Building 670 on Parcel T078 to supply diesel fuel for the emergency generator for the brig. Mr. Templeton, Brig Acting Officer-in-Charge (AOIC), indicated on April 10, 1996 that the tank has a capacity of 200 gallons and is used to store diesel fuel. The basewide environmental baseline survey (EBS) indicated that this tank has a 500-gallon capacity; based on the size of the tank noted during the follow-up reconnaissance, the lower capacity is more accurate.

Parcels T077, T078, T079, and T080 are located in the northeastern portion of NSTI. The site is bounded by Parcels T074 and T076 to the east, Parcels T073 and T072 to the southeast, Parcels T081 and T085 to the south, Parcel T086 to the southwest, Parcel T103 to the west, Parcel T106 to the northwest, and Parcel T113 to the north. Installation Restoration (IR) Sites 22 and 14 are located on adjacent Parcels T074 and T076, respectively. IR Site 7 is located on adjacent Parcel T113. IR Site 10 is located on Parcel T114, which is not adjacent to, but is very near to (less than 50 feet north of) Parcel T077. Figure 1 shows the locations of the adjacent parcels and IR sites.

3.0 REGULATORY COORDINATION

The California Environmental Protection Agency (Cal/EPA), the Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), and the U.S. Environmental Protection Agency (EPA) were notified at the initiation of the EBS and the FOSL and were provided workable draft documents to facilitate their consultative role in developing the environmental documents. Regulatory comments received during EBS and FOSL development were reviewed and addressed, incorporated, or appended as appropriate. Prior to conducting the site-specific EBS and FOSL for the subject property, a scoping meeting was conducted with the Navy, the regulatory agencies, and personnel from PRC and GAIA.

4.0 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

A NEPA document is currently being prepared by the Navy and shall accompany this FOSL.

5.0 ENVIRONMENTAL CONDITION OF THE PROPERTY

According to the site-specific environmental baseline survey (SSEBS) for the site, which included a visual site reconnaissance of each parcel, Parcels T077, T078, T079, and T080 all remain classified as base realignment and closure (BRAC) Category 7. BRAC Category 7 identifies areas where investigation results show that the presence of sources or releases of hazardous substances and/or petroleum products is suspected, but not well characterized

A list of environmental factors and resources considered in the EBS property assessment is provided in Table 1.

TABLE 1

Environmental Factors/Resources Considered for Navy Brig Site

Environmental Factors Considered	Lease Restriction or Notification Required?
Hazardous Substances (Notification)	Yes
Installation Restoration Program (IRP) and Areas of Concern	Yes
Medical/Biohazardous Wastes	No
Oil/Water Separators	No
Unexploded Ordnance	No
Petroleum Products and Derivatives	Yes
Radioactive & Mixed Wastes	No
Storage Tanks	Yes
Asbestos	No
Drinking Water Quality	No
Indoor Air Quality	No
Lead-Based Paint (High-Priority Facilities)	No
Lead-Based Paint (Low-Priority Facilities)	No
Polychlorinated biphenyls	Yes
Radon	No
Air Conformity/Air Permits	No
Energy (Utilities such as Natural Gas, Electric, and Coal)	No
Flood Plains	No
Hazardous Waste Management (By Lessee)	Yes
Historic Property (Archeological/Native American, Paleontological)	No
Occupational Safety and Health Administration	No
Outdoor Air Quality	No
Prime/Unique Farmlands	No
Sanitary Sewer Systems (Wastewater)	No
Sensitive Habitat	No
Septic Tanks (Wastewater)	No
Solid Wastes	No
Storm Sewer Systems (Stormwater)	Yes
Threatened/Endangered Species	No
Transportation	No
Wetlands	No

6.0 LEASE NOTIFICATIONS AND RESTRICTIONS

The environmental documents listed in Section 1.b of this FOSL were evaluated to identify environmental factors that require specific restrictions under the lease to preclude threats to human health or the environment, or require notification to the lessee. The factors that were considered are listed in Table 1. The factors that require either restrictions or notification are identified in Table 1 and are discussed below. The Navy has determined that the remaining factors listed in Table 1 require no restrictions in the lease.

6.1 HAZARDOUS SUBSTANCES NOTIFICATION

Hazardous substances are known to have been stored or used in Buildings 671, 570, and 572, and in the open space of Parcels T078 and T080. Small quantities of aerosol and latex paints, lawn fertilizer, and asphalt compound were observed in the Building 671. Minor chemical storage was observed in Building 570, including Simple Green in the janitorial closet. Oils and greases are kept in Building 572 in small quantities only, and supplies are picked up weekly from Central Supply. Chemicals that are not used within 1 day are stored overnight in a flammable materials storage cabinet, and returned to Central Supply. Waste oils are collected in a hazardous waste collection area on the south side of Parcel T080 parcel. Minor amounts of grease, thread-sealing compound, and paint were present in Building 377. Building 377 is not part of the lease area.

During the 1994 EBS inspection, fuels (10 gallons), oils (12 gallons), and paints (15 gallons) were observed in a flammable storage locker in the open space of Parcel T078. During the 1996 reconnaissance, small quantities of gasoline, paint, paint thinner, and maintenance chemicals were observed in the conex box on Parcel T078. No chemical storage was observed on Parcel T079 during the 1996 reconnaissance. No sources of releases have been identified at the lease area.

In addition, former routine pesticide use around buildings and at recreational areas is likely to have occurred. This information is referenced in the EBS/Community Environmental Response Coordination Act (CERFA) Report and the basewide EBS and is summarized in the SSEBS. Table 2 provides the notice of hazardous substances.

TABLE 2

Notice of Hazardous Substances Stored at Navy Brig Site

Notice is hereby provided that the information set forth below from the basewide environmental baseline survey contains a notice of hazardous substances that are known to have been stored for 1 year or more on Parcels T077, T078, T079, and T080, and the dates such storage occurred.

Parcel	Facility Number	Facility Name	Hazardous Substance(s)	Quantity Stored	Dates Stored
T077	671	Brig workshop	Latex and aerosol paint, fertilizer, asphalt compound	Less than 20 gallons combined	Observed in 1996. Assumed amount 1992-1996.
T078	Open Space	Brig	Diesel fuel, oil, paints, gasoline, paint thinner, acrylic wall patch, asphalt adhesive, motor oil, stainless steel cleaner, and multi-purpose cleaner, and a 5-gallon can of an unidentified hardened blue material	500 gallons of diesel fuel; less than 50 gallons of all other materials combined	Observed in 1994 and 1996. Assumed amount 1992-1996.
T080	377	Sewage Lift Station #17	Synthetic lubricant, less than 1 gallon green paint, thread-sealing compound, a 30-gallon tub of an unidentified red material (a thick liquid)	Less than 35 gallons total	Observed in 1996.
T080	572 and 570	Ship loading training facility	Hydraulic fluid, gasoline in 1-gallon containers, oils, grease, cleaning compounds (Simple Green), waste oil, oily rags	Less than 150 gallons total	Observed in 1996.

6.2 INSTALLATION RESTORATION PROGRAM AND AREAS OF CONCERN

Chemicals of concern have been detected in on-site soil and groundwater samples at low concentrations. Adjacent IR Sites 7, 10, 14, and 22 are located hydraulically downgradient from the site, though tidal influence on groundwater may cause some upgradient encroachment of constituents of concern.

Notification/Restriction. The Lessee will be restricted from conducting excavation, drilling, or other ground disturbing activity, other than minor repairs of the pavement and landscape maintenance, at Parcel T077 without prior written Navy approval and Navy coordination with applicable federal and state regulatory agencies, as necessary. In addition, the lessee will be prohibited from installing any groundwater wells at the subject property, or otherwise using groundwater without prior consent and oversight from the Navy. Provisions will also be placed in the lease to allow the Navy and recognized regulatory agencies unrestricted access to the leased property to conduct necessary investigation and/or cleanup activities. The lessee may not damage existing or future Installation Restoration Program monitoring wells. The lessee will be responsible for any damage it causes to the wells.

6.3 ABOVEGROUND STORAGE TANKS

One active 200-gallon capacity AST is located at Parcel T078. The tank stores diesel fuel for the emergency generator for the Brig. At the time of the follow-up reconnaissance, the tank was in good condition.

<u>Notification/Restriction.</u> The lessee shall manage and maintain the AST in accordance with all applicable local, state, and federal regulations.

6.4 POLYCHLORINATED BYPHENYLS

The lessee will be advised, through the Environmental Condition Report (ECR) and the lease, that two pad-mounted, oil-filled transformers, and seven pole-mounted, oil-filled transformers are located on the site. According to the basewide EBS, four of these transformers have been tested and contain less than 5 parts per million (ppm) polychlorinated biphenyls (PCB). During the basewide EBS, stains were observed beneath one pad-mounted transformer. This transformer has been tested and does not contain PCBs. No staining was observed below this transformer during the follow-up reconnaissance. The Navy has completed its evaluation of the main electrical system and has removed or replaced all PCB-containing equipment. Thus, the transformers at the EBS area are expected to be non-PCB equipment. If additional information is obtained concerning transformers, the lessee will be provided with a list

indicating equipment location and the existence of PCB contamination associated with the equipment, if applicable. No evidence of release of PCB-containing oil was observed at the site.

Notification/Restriction. The Navy will be responsible for disposing of PCB-containing equipment. The Navy will be responsible for any necessary remediation of the PCB contamination from PCB-containing equipment. For the purposes of this lease, the lessee will agree that, in its use and occupancy of the property, the lessee will comply with all applicable local, state, and federal laws relating to disposal of equipment that is regulated as hazardous waste or PCB-contaminated.

6.5 HAZARDOUS WASTE MANAGEMENT (BY LESSEE)

The lessee is anticipated to use small quantities of hazardous materials on the property as part of maintenance operations associated with the proposed jail.

Notification/Restriction. The lessee will be required through the lease to comply with all applicable laws and regulations pertaining to the use, treatment, storage, disposal, and transportation of hazardous materials and will be required to maintain and make available to the Navy all records, inspection logs, and manifests that document compliance. The lessee will be required to have an approved plan for responding to hazardous waste, fuel, or other chemical spills prior to commencement of operations on the leased property. Furthermore, the lessee will be required to construct and operate any necessary hazardous waste storage facilities, and obtain all required permits, including its own EPA hazardous waste generator identification number (EPA ID number).

6.6 STORM SEWER LINES

Storm sewer lines cross all four parcels in the EBS area. No potential contaminant sources to the storm sewers have been identified at the site; however, potential upgradient releases to the storm sewer system cannot be ruled out completely.

Notification/Restriction. The Lessee will be restricted from conducting excavation, drilling, or other ground disturbing activity, other than minor repairs of the pavement and landscape maintenance, at the EBS area without prior written approval from the Navy and Navy coordination with applicable federal and state regulatory agencies, as necessary. In addition, the lessee will be prohibited from installing any groundwater wells at the subject property, or otherwise using groundwater without prior consent and oversight from the Navy. Provisions will also be placed in the lease to allow the Navy and

recognized regulatory agencies unrestricted access to the leased property to conduct necessary investigation and/or cleanup activities.

7.0 REGULATORY AGENCY COORDINATION

DTSC, the RWQCB, and EPA were notified at the initiation of the EBS and the FOSL and were provided workable draft documents to facilitate their consultative role in development of the environmental documents. Regulatory agency comments were received on June 4 and June 14, 1996, and were incorporated or addressed in the document. The regulatory agencies concurred that their comments were adequately addressed.

8.0 UNRESOLVED REGULATORY AGENCY COMMENTS

All regulatory agency comments were addressed and/or incorporated into this document. There were no unresolved regulatory agency comments.

9.0 RECOMMENDED LEASE RESTRICTIONS

Restrictions contained herein are a result of the environmental findings identified in the SSEBS and were assessed in accordance with California Military Environmental Coordination Committee (CBCEC) document *Evaluation of Risks for the Purpose of Reaching a FOSL*, dated January 9, 1995. Parcels T077, T078, T079, and T080 may be used pursuant to the proposed lease, with the following specified use restrictions in the lease, with acceptable risk to human health and the environment.

- a. The lessee and/or authorized sublessee will not dispose of any hazardous materials or waste at the subject property.
- b. The lessee and/or authorized sublessee will be responsible for obtaining all necessary permits and licenses for their own operation. Any violation of permit conditions will be grounds to require the lessee and/or authorized sublessee to cease operations or to terminate the lease. The lessee and/or authorized sublessee will comply with California Environmental Quality Act (CEQA) requirements as may be applicable.
- c. The lessee will submit all proposed construction and modification plans to the Navy for prior approval to ensure protection of human health and the environment at the subject property.

- d. The lessee will be prohibited from digging any foundations, trenches, ditches, holes, or otherwise disturbing the soil, including soils below the groundwater table, at the subject property unless proper dust control measures and appropriate health and safety protection measures are implemented and maintained during these activities, and prior consent and oversight from the Navy has been obtained. This lease restriction will not apply to routine landscaping and pavement maintenance activities.
- e. The lessee will be prohibited from installing any groundwater wells at the subject property, or otherwise using groundwater without prior consent and oversight from the Navy.
- f. Uses by the lessee and authorized sublessee are limited to a type and nature of use that is described in the lease document.
- g. The Navy and regulatory agencies reserve the right to enter the subject property to conduct investigations and surveys, collect samples, perform remediation, access monitoring wells, or engage in other activities associated with the IR and BRAC programs.

10.0 FINDING OF SUITABILITY TO LEASE

Based on the foregoing information and analysis, I find that the subject property (as identified in Section 2.0) is suitable to lease and may be used pursuant to the proposed lease, with the specified use restrictions in the lease, with acceptable risk to human health or the environment and without interference with the environmental restoration process.

Date

R.G. HOCKER JR.
CAPTAIN, CEC, USN
Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command